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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

Francisca Nazareno Yson; Allan
NazarenoYson, Elmer Nazareno Yson,
Gregorio Nazareno Cenon,

Plaintiffs,

v.

Marykay Loss Carlson, in her official
capacity as Ambassador Extraordinary and
Plenipotentiary of the Republic of the
Philippines; United States Department of
State,

Defendants.

Case No. 2:23-cv-00166-APG-VCF

**Joint Stipulation to Extend Federal
Defendants' Deadline to Answer or
Otherwise Respond to Plaintiff's
Complaint [ECF No. 1] (First Request)**

Plaintiffs, Francisca Nazareno Yson, Allan Nazareno Yson, Elmer Nazareno Yson,
and Gregorio Nazareno Cenon, and the United States of America, on behalf of Federal
Defendants Marykay Loss Carlson, in her official capacity, and the United States
Department of State, through counsel, hereby stipulate and agree to extend the United
States' Deadline to answer or otherwise respond to Plaintiffs' Complaint for Injunctive and
Mandamus Relief (ECF No. 1). The reason for the motion is as follows:

1. Plaintiffs filed their Complaint for Injunctive and Mandamus Relief on
January 31, 2023.

2. Plaintiffs served the United States with a copy of the Summons and Complaint on February 1, 2023.

3. The current deadline for Federal Defendants to answer or otherwise respond is April 3, 2023, as April 2, 2023, falls on a Sunday. *See* Fed. R. Civ. P. 6(a)(1)(C).

4. The parties stipulate and agree to provide the United States an additional 30 days to file an answer to the complaint or other responsive pleading. The United States seeks this extension because of: (1) delay in working with the Department of State to get a knowledgeable point of contact; (2) the unique protocols of the Manila Post; and (3) the delay in getting relevant materials and information from the agency. Accordingly, the parties believe good cause exists for the extension.

Therefore, the parties request that the Court extend the deadline for the United States to answer or otherwise respond to May 3, 2023.

Respectfully submitted this 20th day of March 2023.

JASON M. FRIERSON
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/s/ Alexander R. Vail
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IT IS SO ORDERED:


UNITED STATES MAGISTRATE JUDGE

DATED: March 21, 2023